

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION

JOHN DOE and A.B.,

Plaintiffs,

v.

ADAM GRAY et al.,

Defendants.

Case No. 3:20-cv-00129-DRL-MGG

MOTION FOR LEAVE TO MAINTAIN EXHIBITS UNDER SEAL

State Defendant Family Case Manager Katherine Purtee, by counsel, respectfully moves the Court for leave to maintain her summary judgment Exhibits 6, 7, and 9, and the declarations of Suzanne Brewer and Tracy Patrick, under seal, stating as follows:

1. The Court granted the plaintiffs leave to proceed under pseudonyms in this case on April 23, 2020. (ECF 20)
2. Defendant Purtee moved for summary judgment on the one claim remaining against her on August 27, 2021.
3. With her summary judgment motion, Ms. Purtee filed Exhibits 6, 7, and 9, and declarations from foster parents Suzanne Brewer and Tracy Patrick, all of which contain identifying information that could publicly disclose the plaintiffs' identities.
4. Redacted copies of those exhibits were filed publicly. Non-redacted copies of those exhibits were filed under seal in an effort to maintain the anonymity of the plaintiffs' identities.

5. Therefore, in order to comply with the Court's order on pseudonyms, Defendant Purtee seeks leave to maintain the non-redacted copies of the exhibits under seal.

WHEREFORE, Defendant Purtee respectfully moves the Court for leave to maintain under seal the non-redacted versions of summary judgment Exhibit 6, 7, and 9, and the declarations of Suzanne Brewer and Tracy Patrick, and for all other just and proper relief.

Respectfully submitted,

THEODORE E. ROKITA
Indiana Attorney General
Atty. No. 18857-49

Date: August 27, 2021

By: Alexander R. Carlisle
Deputy Attorney General
Atty. No. 34533-49
Indiana Government Center South – 5th Fl.
302 W. Washington Street
Indianapolis, IN 46204-2770
Phone: (317) 234-6667
Fax: (317) 232-7979
Email: Alexander.Carlisle@atg.in.gov